

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re BP p.l.c. Securities Litigation

MDL 2185
No. 4:10-md-02185

This Document Relates to the Following Individual Actions:

<i>Avalon Holdings, Inc., et al. v. BP p.l.c., et al.</i>	No. 4:12-cv-3715
<i>Connecticut Retirement Plans & Trust Funds v. BP p.l.c., et al.</i>	No. 4:12-cv-01272
<i>DiNapoli v. BP p.l.c., et al.</i>	No. 4:14-cv-01083
<i>GIC Private Ltd. v. BP p.l.c., et al.</i>	No. 4:14-cv-01072
<i>Louisiana State Employees' Retirement System v. BP p.l.c., et al.</i>	No. 4:14-cv-01087
<i>Mondrian Global Equity Fund L.P. v. BP p.l.c., et al.</i>	No. 4:12-cv-03621
<i>Virginia Retirement System v. BP p.l.c., et al.</i>	No. 4:14-cv-01085
<i>Washington State Investment Board v. BP p.l.c., et al.</i>	No. 4:14-cv-00980

Honorable Keith P. Ellison

This Document Applies to the Following Plaintiffs:

GIC Private Limited
Lincolnshire County Council
Louisiana State Employees' Retirement System
Metzler Asset Management GmbH (f/k/a Metzler Investment GmbH)
Mondrian International Equity Fund, L.P.
New York State Common Retirement Fund
North Carolina Department of State Treasurer
Public Employees Retirement Association of Colorado
Public School and Education Employee Retirement Systems of Missouri
Teacher Retirement System of Texas
Washington State Investment Board

MOTION TO COMPEL DISCOVERY RESPONSES

Defendants respectfully move the Court, pursuant to Fed. R. Civ. P. 37(a)(3)(B)(iii), to compel the above-listed Plaintiffs in the above-captioned actions to provide a complete response to Defendants' Second Set of Interrogatories, date June 12, 2019, as set out in the accompanying Memorandum of Law, and supporting declarations and exhibits. For the reasons set forth therein, Defendants respectfully request this Motion be granted.

Dated: October 17, 2019

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Attorney-in-Charge for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Motion has been served by electronic CM/ECF filing, on this 17th day of October, 2019.

s/ Thomas W. Taylor

Thomas W. Taylor